

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

L.E., by his next friends and parents,
SHELLEY ESQUIVEL and MARIO
ESQUIVEL,

Plaintiff,

v.

BILL LEE, et al.,

Defendants.

Case No. 3:21-cv-00835

Chief Judge Waverly D. Crenshaw Jr.
Magistrate Judge Alistair E. Newbern

DECLARATION OF JESSICA JERNIGAN-JOHNSON

Pursuant to 28 U.S.C. § 1746, I, Jessica Jernigan-Johnson, hereby declare under penalty of perjury that the following is true and correct:

1. I am over 18 years of age and have direct knowledge of the matters stated herein.
2. Defendants Knox County Board of Education and Superintended Jon Rysewyk, in his official capacity, rely on the attached exhibits in support of their Response in Opposition to Plaintiff's Motion for Summary Judgment filed in this matter.
3. Exhibit 1 is a true and correct copy of excerpts of the deposition of Jennifer Hemmelgarn, KCBOE's 30(b)(6) witness, dated July 29, 2022.
4. I have personal knowledge of the facts in this declaration and, if called to testify, could completely do that.

Dated this 4th day of November, 2022.

s/Jessica Jernigan-Johnson

DAVID M. SANDERS (BPR # 016885)

Senior Deputy Law Director

JESSICA JERNIGAN-JOHNSON (BPR #
032192)

Deputy Law Director

Suite 612, City-County Building

400 Main Street

Knoxville, TN 37902

(865) 215-2327

*Counsel for Defendants, Knox County
Board of Education, Knox County Schools
and Dr. Jon Rysewyk*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed electronically on the date recorded by the Court's electronic filing system. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties who have filed an appearance in the case, by and through the following counsel:

Sasha Buchert
LAMBDA LEGAL DEFENSE AND EDUCATION
FUND INC.
1776 K Street NW, 8th Floor
Washington, DC 20006-5500
Tel: (202) 804-6245
sbuchert@lambdalegal.org

Stella Yarbrough
Lucas Cameron-Vaughn
Thomas H. Castelli
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF TENNESSEE
P.O. Box 120160
Nashville, TN 37212
Tel: (615) 320-7142
syarbrough@aclu-tn.org
lucas@aclu-tn.org
tcastelli@gmail.com

Leslie Cooper
L. Nowlin-Sohl
Meredith Taylor Brown
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
125 Broad St.
New York, NY 10004
Tel: (212) 549-2584
lcooper@aclu.org
lnowlin-sohl@aclu.org
tbrown@aclu.org

Tara L. Borelli (*pro hac vice*)
Carl S. Charles (*pro hac vice*)
LAMBDA LEGAL DEFENSE AND EDUCATION
FUND INC.
1 West Court Square, Suite 105
Decatur, GA 30030-2556
Tel: (404) 897-1880
Fax: (404) 506-9320
tborelli@lambdalegal.org
ccharles@lambdalegal.org

Jennifer Milici
John W. O'Toole
Wilmer, Cutler & Pickering Hale and Dorr,
LLP
1875 Pennsylvania Avenue NW
Washington, DC 20006
(202) 663-6256
jennifer.milici@wilmerhale.com
john.o'toole@wilmerhale.com

Clark Lassiter Hildabrand
Stephanie A. Bergmeyer
Tennessee Attorney General's Office
P.O. Box 20207
Nashville, TN 37202-0207
(615) 741-6828
clark.hildabrand@ag.tn.gov
stephanie.bergmeyer@ag.tn.gov

Alan Schoenfeld
WILMER CUTLER PICKERING
HALE AND DORR LLP
7 World Trade Center
250 Greenwich Street, 45th Floor
New York, NY 10007
Tel: (212) 937-7294
alan.schoenfeld@wilmerhale.com

Matthew D. Benedetto
Thomas F. Costello-Vega
WILMER CUTLER PICKERING
HALE AND DORR LLP
350 South Grand Avenue, Suite 2400
Los Angeles, CA 90071
Tel: (213) 443-5300
matthew.benedetto@wilmerhale.com
thomas.costello@wilmerhale.com

Emily L. Stark (*pro hac vice*)
Samuel M. Strongin (*pro hac vice*)
Britany Riley-Swanbeck (*pro hac vice*)
WILMER CUTLER PICKERING
HALE AND DORR LLP
1875 Pennsylvania Ave. NW
Washington, DC 20006
Tel: (202) 663-6000
emily.stark@wilmerhale.com
samuel.strongin@wilmerhale.com
britany.riley-swanbeck@wilmerhale.com

s/Jessica Jernigan-Johnson
JESSICA JERNIGAN-JOHNSON

